REMARKS

The Examiner's Action mailed on May 3, 2006, has been received and its contents carefully considered.

In this Amendment, Applicants have editorially amended claims 1, 17, 18, 22 and 23. Claim 1 is the sole independent claim, and claims 1-25 remain pending in the application. For at least the following reasons, it is submitted that this application is in condition for allowance.

Claims 1-25 were rejected under 35 U.S.C §103(a) as being obvious over *Godwin et al.* (U.S. 6,505,192 B1) in view of *Harvey et al.* (U.S. 2004/0054807 A1) This rejection is respectfully traversed.

Responsive to the rejections made in the Official Action, Claim 1 has been amended to recite "building a peer table, wherein the peer table includes fields of peer identification, address, prefix, and type" and "searching the peer table, and then comparing the Security Policy Database set with the field of address of the peer table so as to obtain a corresponding peer-based Security Policy Database".

Godwin et al. fails to explicitly disclose "building a peer table", as admitted in the Office Action, and although *Harvey et al.* discloses building a number of tables, the method proposed by *Harvey et al.* is a virtual naming scheme trying to organize nodes so that the addressing/accessing time can be reduced and the so-called GUIDs are generated by one-way consistent hash, such as MD-5. The peer table of the present invention is used to handle physical IP addresses, and is much different form what *Harvey et al.* uses. Additionally, the method of the

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invention was developed by observing the locality of IP addresses, whereas *Harvey et al.* uses two address spaces, one of which is the name ID space (e.g., DNS name); and the other one is the hash generated ID.

The Office Action refers to paragraphs [0254] and [0255] of *Harvey et al.* for building a peer table, and paragraph [0254] is merely the heading "5.3.1 P-Table Construction", hence the Office action maintains that the P-Table of *Harvey et al.* corresponds to the claimed peer table. Paragraph [0251] explains that the P-Table "is short for the proximity table". *Harvey et al.*'s proximity table is not equivalent to the claimed peer table, and *Harvey et al.* fails to disclose that it contains the same fields.

More particularly, nowhere in *Harvey et al.* provides any specific teaching or suggestion of "building a peer table, *wherein the peer table includes fields of peer identification, address, prefix, and type*" as presently claimed.

Godwin et al., in Fig. 3 and the description thereof, discloses that the rule searching occurs at the Internet protocol (IP) layer, and then determines if incoming packet contains an authentication header (AH) or an Encapsulation Security Payload (ESP), which is *not* to handle a physical IP address. See the paragraph from col. 6, line 47-col. 7, line 11, in which the sentence that the Office Action appears to allude to has been emphasized in italics:

FIG. 3 shows how Ipsec rule searching has been implemented in the
known prior art for packets incoming to a node. This rule searching occurs

at the Internet Protocol (IP) layer. Step **302** determines if an incoming packet contains an authentication header (AH) or an Encapsulating Security Payload (ESP) header. An AH header specifies that authentication of the origin of this packet be established. An ESP header specifies that the packet is encrypted; an ESP header may also specify authentication, as well as encryption. If either of these headers is present, a Security association must be identified to determine how to authenticate or to decrypt the packet. *Step* **306** *locates the applicable Security association using the SPI (Security Parameter Index) as an index into a hash table of Security associations.* Step **308** uses the information contained in the SECURITY_ASSOC to decapsulate (authenticate or decrypt) the packet. The authenticated or decrypted packet may now be used to search the security rules in sequence to find the first matching static or dynamic rule. This is performed at step **304**. Step **312** illustrates that the search in step **304** continues until a match occurs (the last rule of a security database typically matches everything). When a rule match occurs, the rule is used to determine at steps **314** and **318** if the packet should be discarded. If the packet is not discarded at step **314**, step **316** determines if the matching rule requires that Ipsec processing be applied or not. If Ipsec processing is not required and if an AH or ESP header was not present in the incoming packet, then the packet is permitted at step **324**. If step **326** determines that an AH or ESP header was present, this indicates that Ipsec processing is required, but the matching rule says that it is not. This is an inconsistent state and the packet is discarded at step **328**.

(*emphasis added*)

Hence, *Godwin et al.* discloses that "Step **306** locates the applicable

Security association using the SPI (Security Parameter Index) as an index into a

hash table of Security associations" but fails to teach or suggest "searching the peer table*, and then comparing the Security Policy Database set with the field of address of the peer table* so as to obtain a corresponding peer-based Security Policy Database" (*emphasis added*), and neither does the Office Action contend that this is taught by *Harvey et al.*
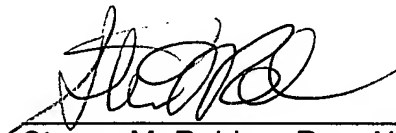
As *Godwin et al.* and *Harvey et al.,* whether taken separately or in combination, fail to teach or suggest all the features recited in claim 1, the claimed invention is non-obvious.

It is submitted that this application is in condition for allowance. Such action and the passing of this case to issue are requested.

Should the Examiner feel that a conference would help to expedite the prosecution of this application, the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

Should any fee be required, however, the Commissioner is hereby authorized to charge the fee to our Deposit Account No. 18-0002, and advise us accordingly.

Respectfully submitted,

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Date

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